

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

GRAMBLING T. DOMINIQUE JR.,

PLAINTIFF,

vs.

ILLINOIS STATE TROOPER SNIDEY,  
UNKNOWN DEFENDANT OFFICER

DEFENDANTS.

Case No.: 19-cv-2280

Judge Manish S. Shah

Magistrate Judge Young B. Kim

**PLAINTIFF'S COUNSEL'S MOTION FOR LEAVE TO FILE A REPLY TO  
PLAINTIFF'S RESPONSE TO PLAINTIFF'S COUNSEL'S MOTION TO WITHDRAW**

NOW COMES the Plaintiff's counsel's, Blake W. Horwitz, Esq. and Robert S. Kroeger, Esq. and brings their Motion for Leave to File a Reply to Response to Plaintiff's Motion to Withdraw as Counsel of Record. In support, Plaintiff's counsel states as follows:

1. On November 26, 2019, Plaintiff's counsel filed their motion to withdraw as counsel of record citing irreconcilable differences with the Plaintiff. [Dkt. 59]. Careful not to divulge information protected by the attorney-client privilege, Plaintiff's counsel did not elaborate on the nature of the irreconcilable differences.

2. On December 4, 2019, the Plaintiff filed a response to Plaintiff's counsel's motion. [Dkt. No. 60]. Relative to the irreconcilable differences between Plaintiff and Plaintiff's counsel, the motion largely discusses communications that Plaintiff's counsel had with Plaintiff regarding a witness to the case. *Id.* This is a narrow framing of the differences the Plaintiff and the Plaintiff's counsel have experienced during this litigation.

3. Plaintiff's counsel did not anticipate discussing the specific nature of the irreconcilable difference. Given Plaintiff's response, it is necessary to do so. This requires a

detailed analysis of the Illinois Rules of Professional Conduct. Plaintiff's counsel is requesting that the Court allows Plaintiff's counsel to file a reply to the Plaintiff's response. Plaintiff's counsel asks that it is given until December 13, 2019 to file the reply so that Plaintiff's counsel can consult with an independent attorney regarding any potential attorney-client privilege issues that may arise in Plaintiff's counsel's reply.

4. Plaintiff further requests that if the Court grants this motion any reply that is filed regarding the Motion to Withdraw is filed under seal to protect any attorney-client communication and/or work product regarding irreconcilable differences.

WHEREFORE Plaintiff's counsel respectfully requests that the Court grant Plaintiff's Counsel's Motion for Leave to File a Reply to Plaintiff's Response to Plaintiff's Counsel's Motion to Withdraw.

Respectfully submitted,

*s/ Robert Kroeger*  
An attorney for the Plaintiff

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**CERTIFICATE OF SERVICE**

On December 6, 2019, I, the undersigned caused the above Plaintiff Counsel's Motion for Leave to File a Reply to Plaintiff's Response to Plaintiff's Counsel's Motion to Withdraw to be filed with the Clerk of the Court using the Northern District of Illinois ECF/CM e-filing system which sent notice to all parties of record. Additionally, I sent a copy via e-mail to the parties listed below:

Grambling T. Dominique  
gtdominique72@yahoo.com

Respectfully submitted,

**s/ Robert Kroeger**

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